

REMARKS

This Application has been carefully reviewed in light of the Office Action mailed June 19, 2006. Claims 1-22 are pending in the application. Claims 1-22 are rejected in the application. Claims 1, 5, 6, 11, 12, 16, 17, and 22 have been amended. Applicants respectfully request reconsideration and favorable action of all pending claims in view of the following remarks.

Objections to the Abstract

The Office Action objected to the Abstract of the Disclosure because it is longer than 150 words. Applicants have amended the Abstract accordingly. Favorable action is requested.

Objections to the Drawings

The drawings are objected to under 37 CFR 1.84(p)(5). The Office Action states that the drawings do not include the thin client "12" reference sign mentioned in the description. Applicants have amended FIGURE 1 with reference numeral "12" explicitly pointing to the relevant thin client portion. Amended drawings are attached. The Office Action also states that the drawings include the reference character "118" not mentioned in the description. The third paragraph on Page 15 has been amended accordingly. Applicants respectfully submit that no new matter has been added. Favorable action is requested.

Section 112 Rejections

The Office Action rejects Claims 1-22 under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Although Applicants traverse, in order to expedite prosecution, the claims have been amended to address these rejections. Favorable action is requested.

Nevertheless, Applicants do address the impropriety of the rejections based on the grounds that "it is unclear what is meant by strongly-connected." Applicants note that the essential inquiry pertaining to the definiteness requirement is whether the claims set out and circumscribe subject matter with a reasonable degree of clarity and particularity. Definiteness of claim language must be analyzed, not in a vacuum, but in light of: (a) the

content of the particular application disclosure; (b) the teachings of the prior art; and (c) the claim interpretation that would be given by one possessing ordinary skill in the art at the time the invention was made. *See* M.P.E.P. § 2173.02. Furthermore, the test for indefiniteness under Section 112, second paragraph, is whether “those skilled in the art would understand what is claimed when the claim is read in light of the specification.” *See* M.P.E.P. §2173.02 (citing *Orthokinetics, Inc. v. Safety Travel Chairs, Inc.*, 806 F.2d 1565, 1576 (Fed. Cir. 1986)).

Applicants respectfully submit that the meaning and scope of Claim 1 would be clear to one of ordinary skill in the art at the time of invention, whether the claim is read alone or in combination with the Specification. For example, Applicants respectfully cite at least Page 4, lines 19-21, and Page 8, lines 14-16 of the Specification which provide example descriptions corresponding to “strongly-connected components.” Claim 1 and its dependent claims are therefore definite. For substantially similar reasons, Claims 11, 12 and 22 are definite. Nevertheless, Applicants have amended the claims rejected on these grounds solely to expedite prosecution. In doing so, Applicants have not narrowed the scope of the claims and do not intend to surrender any subject matter.

Section 102 and 103 Rejections

Claims 1-3, 5, 9, 11-14, 16, 20, and 22 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,102,958 issued to Meystel et al (“*Meystel*”). Claims 4, 6-8, 10, 15, 17-19 and 21 are rejected under 35 U.S.C. §103(a) as being unpatentable over *Meystel*, in view of U.S. Patent No. 6,826,541 issued to Johnston et al (“*Johnston*”). Applicants respectfully traverse these rejections for the reasons described below.

Claim 1 is allowable at least because the cited references do not teach or suggest “converting a second plurality of said received decision inputs to a plurality of mathematical representations.” The Office Action contends that Column 15, lines 57-62 of *Meystel* discloses these limitations. The Office Action is incorrect. Rather, *Meystel* is concerned with regulating plant performance using a multi-valued graph representation, without generating mathematical representations. *See Meystel*, column 8, lines 35-39. In fact, several portions of *Meystel* specifically state that mathematical representations are not used. *See Meystel*, column 3, lines 1-5 and column 21, lines 59-63. The portion of *Meystel* relied upon by the Office Action merely discloses algorithms for incorporating new data into the multi-valued

graph representation, but clearly does not teach or disclose “converting a second plurality of said received decision inputs to a plurality of mathematical representations” as recited in Claim 1.

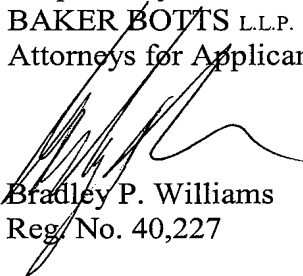
For at least these reasons, Claim 1 is allowable as are all the claims depending therefrom. In addition, Claims 11, 12, and 22 are each allowable for analogous reasons, as are the claims depending therefrom. Favorable action is requested.

Conclusions

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other apparent reasons, Applicants respectfully request full allowance of all pending Claims. If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Brad P. Williams, Attorney for Applicants, at the Examiner's convenience at (214) 953-6447.

Applicants believe no fee is due. However, should there be a fee discrepancy, the Commissioner is hereby authorized to charge any required fees or credit any overpayments to Deposit Account No. **02-0384** of **Baker Botts L.L.P.**

Respectfully submitted,
BAKER BOTTS L.L.P.
Attorneys for Applicants



Bradley P. Williams
Reg. No. 40,227

Date: 9/14/06

Correspondence Address:

Customer Number: **46629**